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DEPUTY

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN JOAQUIN

12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

15 v.

16 **MAGDALENA (MAGGIE) SALAS,**
17 **ANGELINA MIRELES, JULISSA**
18 **GARCIA.**

Case No.

COMPLAINT [FELONY]

DATE:
TIME:
DEPT:

20 I, the undersigned, say on information and belief, that in the County of San Joaquin, State
21 of California:

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1 **COUNT ONE**

2 [Penal Code Section 182(a)(1)/Civil Code Section 2944.7]

3 On or about and between November 1, 2009 through August 3, 2011, DEFENDANTS
4 MAGGIE SALAS, ANGELINA MIRELES, and JULISSA GARCIA while acting as an owner,
5 manager, agent, or employee of Salas Properties, and/or Legacy, and/or LHL, and/or Peace and
6 Freedom Legal Services committed the crime of CONSPIRACY in violation of section 182(a)(1)
7 of the Penal Code in that said Defendants did unlawfully conspire together to claim, demand,
8 charge, collect or receive upfront fees for loan modification services in violation of section
9 2944.7 of the Civil Code ; that pursuant to and for the purposes of carrying out the objectives and
10 purposes of the aforesaid conspiracy, the said defendants committed the following overt acts in
11 the county of San Joaquin.

12 Overt Act 1: Demanded and collected an upfront fee for a loan modification from Jaime
13 and Carmen Quinonez, in the amount of \$1,500, on January 4, 2011.

14 Overt Act 2: Demanded and collected an upfront fee for a loan modification from Blanca
15 and Reynoldo Estrada, in the amount of \$1,000, on December 9, 2010.

16 Overt Act 3: Demanded and collected an upfront fee for a loan modification from Jose and
17 Veronica Aguas, in the amount of \$2,000, on April 14, 2010.

18 Overt Act 4: Demanded and collected an upfront fee for a loan modification from Jose
19 Marban Giles and Ana Marban, in the amount of \$1,000, on April 8, 2010.

20 Overt Act 5: Demanded and collected an upfront fee for a loan modification from Jeffrey
21 and Charlotte Elder, in the amount of \$1,999, on January 14, 2010.

22 Overt Act 6: Demanded and collected an upfront fee for a loan modification from Lydia
23 and Richard Selfa, in the amount of \$1,000, on November 10, 2009.

24 **COUNT TWO**

25 [Penal Code Section 182(a)(1)/Business and Professions Code 17500]

26 On or about and between January 1, 2009 to January 2011, DEFENDANTS MAGGIE
27 SALAS, ANGELINA MIRELES, and JULISSA GARCIA while acting as an owner, manager,
28 agent, or employee of Salas Properties, and/or Legacy, and/or LHL, and/or Peace and Freedom

1 Legal Services committed the crime of CONSPIRACY in violation of section 182(a)(1) of the
2 Penal Code in that said Defendants did unlawfully conspire together to commit the crime of
3 FALSE ADVERTISING in violation of Section 17500 of the Business and Professions Code; that
4 pursuant to and for the purposes of carrying out the objectives and purposes of the aforesaid
5 conspiracy, the said defendants committed the following overt acts in the county of San Joaquin.

6 Overt Act 1: Between January 1, 2009 and January 2011, falsely promised potential
7 customers of Salas Properties, Legacy, and or Peace and Freedom Legal Services that if the
8 efforts of the business to secure a home loan modification were unsuccessful, the customer would
9 receive a full refund.

10 Overt Act 2: Between January 1, 2009 and January 2011, overstated the actual success
11 rate of loan modifications obtained on behalf of borrowers who had previously used the services
12 of Salas Properties and/or Legacy and/or Peace and freedom Legal Services.

13 Overt Act 3: Between January 1, 2009 and January 2011, falsely advertised to customers
14 that they would receive a loan modification through federal government programs, regardless of
15 their financial situation.

16 Overt Act 4: Between January 1, 2009 and January 2011, falsely represented to potential
17 customers that attorneys would be working on their files.

18 Overt Act 5: Between January 1, 2009 and January 2011, circulated flyers to potential
19 customers in Stockton which state, in English and in Spanish: "WE WILL SAVE YOUR HOME!
20 GUARANTEED!!" and "STAY in your home, GUARANTEED new lower mortgage payments"
21 and "ONE PHONE CALL WILL CHANGE YOUR LIFE", "BANKRUPTCY, STAY In Your
22 Home" when in fact such promises were false.

23 Overt Act 6: Between January 1, 2009 and January 2011, made similar false promises on
24 television and radio advertisements in Spanish and English and on a large billboard on the corner
25 of West Lane and Hammer Lane in Stockton, California.
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COUNT THREE

(Penal Code section 487(a))

The undersigned further deposes and says on information and belief that, MAGGIE SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or about July 22, 2010, commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendants did willfully and unlawfully take or aided and abetted in the taking of the personal property of Jose and Veronica Aguas and that the value of the property exceeds NINE HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately THREE THOUSAND NINE HUNDRED DOLLARS (\$3,900).

COUNT FOUR

(Penal Code section 487(a))

The undersigned further deposes and says on information and belief that, MAGGIE SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or about February 19, 2009, commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendants did willfully and unlawfully take or aid and abet in the taking of the personal property of Amandeep Kaur and Varinderjit Singh and that the value of the property exceeds NINE HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500).

COUNT FIVE

(Penal Code section 487(a))

The undersigned further deposes and says on information and belief that, MAGGIE SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or about February 16, 2009, commit a Felony, to wit: GRAND THEFT OF PERSONAL

1 PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said
2 defendants did willfully and unlawfully take or aided and abetted in the taking of the personal
3 property of Alvis and Susan Bulahan and that the value of the property exceeds NINE
4 HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately TWO
5 THOUSAND FIVE HUNDRED DOLLARS (\$2,500).

6
7 **COUNT SIX**

8 (Penal Code section 487(a))

9 The undersigned further deposes and says on information and belief that, MAGGIE
10 SALAS and JULISSA GARCIA and ANGELINA MIRELES did, in the county of San Joaquin,
11 State of California, on or about January 1, 2009 through September 30, 2009, commit a Felony, to
12 wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL
13 CODE of California, in that said defendants did willfully and unlawfully take or aided and
14 abetted in the taking of the personal property of Lawrence and Jacqueline Bush and that the value
15 of the property exceeds NINE HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum
16 taken is approximately SEVEN THOUSAND FOUR HUNDRED (\$7,400).

17
18 **COUNT SEVEN**

19 (Penal Code section 487(a))

20 The undersigned further deposes and says on information and belief that, MAGGIE
21 SALAS and ANGELINA MIRELES did, in the county of San Joaquin, State of California, on or
22 about February 13, 2009, commit a Felony, to wit: GRAND THEFT OF PERSONAL
23 PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said
24 defendants did willfully and unlawfully take or aided and abetted in the taking of the personal
25 property of Robert and May Bush and that the value of the property exceeds NINE HUNDRED
26 AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately TWO THOUSAND
27 FIVE HUNDRED DOLLARS (\$2,500).

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2 **COUNT EIGHT**

3 (Penal Code section 487(a))

4 The undersigned further deposes and says on information and belief that, MAGGIE
5 SALAS and ANGELINA MIRELES did, in the county of San Joaquin, State of California, on or
6 about February 20, 2009 through March 11, 2009, commit a Felony, to wit: GRAND THEFT OF
7 PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in
8 that said defendants did willfully and unlawfully take or aided and abetted in the taking of the
9 personal property of Gabriel and Ramona Calderon and that the value of the property exceeds
10 NINE HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately
11 TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500).

12
13 **COUNT NINE**

14 (Penal Code section 487(a))

15 The undersigned further deposes and says on information and belief that, MAGGIE
16 SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or
17 about July 14, 2010, commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a
18 violation of section 487(a) of the PENAL CODE of California, in that said defendants did
19 willfully and unlawfully take or aided and abetted in the taking of the personal property of Jeffrey
20 and Charlotte Elder and that the value of the property exceeds NINE HUNDRED AND FIFTY
21 DOLLARS, CASH (\$950), the sum taken is approximately ONE THOUSAND NINE
22 HUNDRED AND NINETY NINE DOLLARS (\$1,999).

23
24 **COUNT TEN**

25 (Penal Code section 487(a))

26 The undersigned further deposes and says on information and belief that, MAGGIE
27 SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or
28 about January 4, 2011 through May 31, 2011, commit a Felony, to wit: GRAND THEFT OF

1 PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in
2 that said defendants did willfully and unlawfully take or aided and abetted in the taking of the
3 personal property of Jaime and Carmen Quinonez and that the value of the property exceeds
4 NINE HUNDRED AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately
5 THREE THOUSAND TWO HUNDRED DOLLARS (\$3,200).

6
7 **COUNT ELEVEN**

8 (Penal Code section 487(a))

9 The undersigned further deposes and says on information and belief that, MAGGIE
10 SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or
11 about July 8, 2009, commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a
12 violation of section 487(a) of the PENAL CODE of California, in that said defendants did
13 willfully and unlawfully take or aided and abetted in the taking of the personal property of
14 Gurikubal Singh and Ravinder Kaur and that the value of the property exceeds NINE HUNDRED
15 AND FIFTY DOLLARS, CASH (\$950), the sum taken is approximately TWO THOUSAND
16 FIVE HUNDRED DOLLARS (\$2,500).

17
18 **COUNT TWELVE**

19 (Civil Code section 2945.4)

20 The undersigned further deposes and says on information and belief that, MAGGIE
21 SALAS and JULISSA GARCIA did, in the county of San Joaquin, State of California, on or
22 about July 8, 2009, commit a Felony, to wit: FORECLOSURE CONSULTANT-PROHIBITED
23 ACTS, a violation of sections 2945.4 and 2945.7 of the Civil Code of California, in that said
24 defendants did willfully and unlawfully, being foreclosure consultants as defined by Civil Code
25 section 2945.1, claim, demand, charge, collect, or receive compensation to wit: money, from the
26 owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: Gurikubal
27 Singh and Ravinder Kaur who lived at 1501 Woodhaven Circle, Roseville California, before
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1 performing each and every service contracted, or otherwise represented to be performed.

2
3 **COUNT THIRTEEN**

4 (Civil Code section 2945.4)

5 The undersigned further deposes and says on information and belief that, MAGGIE
6 SALAS did, in the county of San Joaquin, State of California, on or about April 1 2010 through
7 May 31, 2010, commit a Felony, to wit: FORECLOSURE CONSULTANT-PROHIBITED
8 ACTS, a violation of sections 2945.4 and 2945.7 of the Civil Code of California, in that said
9 defendant did willfully and unlawfully, being a foreclosure consultant as defined by Civil Code
10 section 2945.1, claim, demand, charge, collect, or receive compensation to wit: money, from the
11 owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: William
12 Carroll Logan who lived at 10167 River Falls, Stockton, California, before performing each and
13 every service contracted, or otherwise represented to be performed.

14
15 **COUNT FOURTEEN**

16 (Business and Professions Code section 10130)

17 The undersigned further deposes and says on information and belief that, MAGGIE
18 SALAS did, in the county of San Joaquin, State of California, on or about and between January,
19 1, 2009 through August 3, 2011, commit the continuing offense of ENGAGING IN REAL
20 ESTATE WITHOUT A LICENSE, a misdemeanor violation of section 10130 of the Business
21 and Professions Code of California, in that said defendant did willfully and unlawfully, engage in
22 the business of, act in the capacity of, advertize or assume to act as a real estate broker or real
23 estate salesman, within California, without being licensed to do so.

24
25 **COUNT FIFTEEN**


26 (Civil Code section 2944.6)

27 The undersigned further deposes and says on information and belief that, MAGGIE
28

1 SALAS, JULISSA GARCIA and ANGELA MIRELES did, in the county of San Joaquin, State of
2 California, on or about January 4, 2011 and January 14, 2011, commit a Misdemeanor, to wit:
3 LOAN MODIFICATION AGREEMENT VIOLATION, in violation of Section 2944.6 of the
4 Civil Code while acting as an owner, operator, manager, controller, agent, or employee of Salas
5 Properties, Legacy, LHL, and or Peace and freedom Legal Services, negotiated, attempted to
6 negotiate, arranged, attempted to arrange, or otherwise offered to perform a mortgage loan
7 modification or other form of mortgage loan forbearance for a fee or other compensation paid by
8 borrowers, without, prior to entering into any fee agreement with said borrowers, providing to
9 said borrowers a separate written statement as required by Section 2944.6 of the Civil Code in not
10 less than 14-point bold type, including but not limited to those borrowers identified in Count One
11 of this complaint.
12

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 15th day of November, 2011, at Sacramento, California.
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17 
18 MAGGY KRELL
19 Deputy Attorney General

20 **DISCOVERY REQUEST**

21 Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby
22 requested that all materials and information as set forth in Penal Code section 1054.3(a) and (b)
23 be provided to the People.

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